

Exhibit B

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Attorneys for Non-Party Dario Amodei

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE OPENAI CHATGPT LITIGATION

Case No. 3:23-cv-03223-AMO

IN RE MOTION TO COMPEL COMPLIANCE
WITH NON-PARTY SUBPOENAS

**DECLARATION OF ASSAD H.
RAJANI IN SUPPORT OF NON-
PARTY DARIO AMODEI'S
[PROPOSED] SUR-REPLY IN
FURTHER OPPOSITION TO
MOTION TO COMPEL**

In the matter of

AUTHORS GUILD, *et al.*, individually and on
behalf of others similarly situated,

Misc. Case No. 3:25-mc-80017-AMO

Plaintiffs,

v.

Underlying Litigation: *Authors Guild, et al.*
v. OpenAI, et al., 1:23-cv-0822-SHS
(S.D.N.Y)

OPENAI INC., *et al.*,

Defendants.

1 I, Assad H. Rajani, declare:

2 1. I am an attorney at Arnold & Porter Kaye Scholer LLP. I represent non-party Dario
3 Amodei in the above-captioned matters. I submit this declaration in support of Mr. Amodei's
4 Administrative Motion Requesting Leave to File a [Proposed] Sur-Reply in Further Opposition to
5 Plaintiffs' Motion to Compel. The information set herein is true to the best of my knowledge,
6 information, and belief, and if called upon to testify, I could and would testify to the following.

7 2. Attached to this declaration as **Exhibit 1** is a true and correct copy of the rough
8 transcript from the March 3, 2025 deposition of Benjamin J. Mann, which is filed under seal.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct.

11
12 Dated: March 3, 2025

Respectfully submitted,

13 /s/ Assad H. Rajani

14 ASSAD H. RAJANI

15 **ARNOLD & PORTER KAYE SCHOLER LLP**

16 *Attorney for Non-Party Dario Amodei*
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